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8 UNITED STATES BANKRUPTCY COURT  
9 DISTRICT OF OREGON

10 In re ) Case No. 09-40551-rld7  
11 Joel Robert Knowling, )  
12 Debtor. ) Chapter 7  
13 ) DEBTOR'S MOTION FOR ORDER  
14 ) GRANTING EXTENSION OF TIME TO  
FILE SCHEDULES AND STATEMENT  
OF INTENTIONS  
)

15 Joel R. Knowling ("Debtor") moves this court for entry of an administrative order  
16 extending until January 15, 2010, the time for filing his Schedules and Statement of Financial  
17 Affairs. In support of this motion, Debtor submits the following:

18 1. On December 18, 2009 ("Petition Date"), Debtor filed a voluntary petition under  
19 Chapter 7 of the Bankruptcy Code. It was an "emergency filing" because of a show cause  
20 hearing set later that day, and an impending contempt motion.

21 2. Pursuant to the Court's Order and Notice Regarding Filing of Document(s); and  
22 Notice of Proposed Dismissal [Dkt #5] entered on December 21, 2009, Debtor is required to file  
23 (i) Attorney's Statement/Disclosure of Compensation, (ii) complete Schedules including the  
24 Summary of Schedules and Declaration of Schedules, and (iii) the Statement of Financial Affairs  
25 ("SOFA") by January 4, 2010 (collectively, the "Required Documents"). For the reasons  
26 explained more fully below, Debtor needs additional time to finalize the Required Documents

1 before filing them with the Court.

2 **Jurisdiction**

3 3. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § § 157 and  
4 1334 and LR 2100.1. Consideration of this motion constitutes a core proceeding within the  
5 meaning of 28 U.S.C. § 157(b)(2)(A). The predicate for the relief sought by this motion is  
6 Bankruptcy Rule 1007(c). Venue is proper under 28 U.S.C. § 1408.

7 **Relief Requested**

8 4. By this motion, the Debtor seeks entry of an order extending until January 15,  
9 2010, the time within which it must file the Required Documents identified in paragraph 2  
10 above.

11 **Points and Authorities**

12 5. Under Bankruptcy Rule 1007(c), in a voluntary case, the schedules, statements,  
13 and other documents required by Bankruptcy Rule 1007(b), including the SOFA, must be filed  
14 with the petition, or within 14 days thereafter, unless that period is extended “on motion for  
15 cause shown and on notice to the United States trustee and to any committee. . . appointed under  
16 § 1102 of the Code, . . . or other party as the court may direct.”

17 6. Good cause exists for granting the limited extension requested by this motion.  
18 The Debtor is unable to fully complete and file the Required Documents within 14 days of the  
19 Petition Date (i.e., January 4, 2010) because, among other reasons, the undersigned’s bankruptcy  
20 paralegal is on vacation until January 4, 2010.

21 WHEREFORE, the debtor requests entry of an order extending until January 15, 2010,  
22 the time within which it must file the Required Documents.

23 DATED this 22<sup>nd</sup> day of December, 2009. GREENE & MARKLEY, P.C.

24 By /s/ Heather E. Harriman  
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Attorneys for Debtor

CERTIFICATE OF SERVICE

I CERTIFY that, on the date set forth below, true and correct copies of DEBTOR'S MOTION FOR ORDER GRANTING EXTENSION OF TIME TO FILE SCHEDULES AND STATEMENT OF INTENTIONS, were served by electronic notice through the bankruptcy court's ECF system, upon the following:

Peter C. McKittrick, Trustee  
[pmckittrick@mckittrickinc.com](mailto:pmckittrick@mckittrickinc.com)  
[pmckittrick@ecf.epiqsystems.com](mailto:pmckittrick@ecf.epiqsystems.com)  
[cmorris@mckittrickinc.com](mailto:cmorris@mckittrickinc.com)  
US Trustee, Portland  
[USTPRegion18.PL.ECF@usdoj.gov](mailto:USTPRegion18.PL.ECF@usdoj.gov)

DATED this 22<sup>nd</sup> day of December, 2009.

/s/ Heather E. Harriman  
Heather E. Harriman, OSB #99236  
Attorneys for Debtor

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